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October 9, 2025

By ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: United States v. Linda Sun, a/k/a “Wen Sun,” “Ling Da Sun,” and “Linda Hu,”
and Chris Hu, S4 24 Cr. 346 (BMC) (TAM)**

Your Honor:

We represent Linda Sun in the above-referenced matter and write regarding a correction to a citation in the defendants’ joint opposition to the government’s motions *in limine*, which was filed on October 6, 2025. (Dkt. 190.) On page 19 of that opposition, the following text appears:

“Further, while the property interest in a § 1346 case is a fiduciary’s honest services rather than the value of goods exchanged, courts have long recognized that evidence showing a benefit received or lack of harm is probative of both intent and materiality.” *See United States v. Rybicki*, 354 F.3d 124, 145 (2d Cir. 2003) (en banc).

(*Id.* at 19.) As the “*See*” signal indicates, the above statement is argument relying on *Rybicki*, not an express quotation from that decision. During the process of compiling and finalizing the opposition, quotation marks were inadvertently included in error.

We thank the government for inquiring about this matter and apologize for the oversight.

Respectfully submitted,

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